



DLA Piper Rudnick Gray Cary US LLP
1200 Nineteenth Street, NW
Suite 700
Washington, DC 20036-2430
T 202.861.3910
F 202.223.2085
W www.dlapiper.com

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: WT Docket No. 05-157
FCC 05-80
Written Ex Parte Presentation

Dear Ms. Dortch:

IPWireless, Inc., ("IPWireless") by its attorneys, hereby submits this written ex parte presentation pursuant to Section 1.1206(b)(1) of the Commission's Rules. By Public Notice (FCC 05-80) released March 29, 2005, the Commission requested input regarding short-term and long-term needs for additional spectrum allocation to meet the needs of Federal, State, and local emergency response providers, including the possible allocation of additional spectrum in the 700 MHz band for emergency response providers.

IPWireless is an industry-leading developer of next-generation mobile and portable wireless broadband technology, engineered with the quality and dependability required to meet the needs of emergency response providers. Based upon the global 3GPP TD-CDMA standard, the IPWireless system is now commercially deployed in ten countries and is being trialed by an additional thirty operators.. The IPWireless technology platform has evolved from its beginnings as an exclusively time division duplex (TDD) system, and now incorporates the ability to use paired frequency division duplex (FDD) spectrum, as well as providing high speed downlink packet access (HSDPA) capability. IPWireless is the first, and to date only, company to have commercially available HSDPA, a vital component for emergency response as it provides high data rate mobile broadband access to vehicles/terminals traveling at high speed.

IPWireless' technology, as it is being commercially deployed today, is fully capable of meeting the near-term data and video needs of emergency response providers. Downlink data rates per sector using a 10 MHz TDD (unpaired channel) range from approximately 1 Mbps at the cell edge to nearly 10 Mbps peak data rate, with an average of 4 Mbps. With a paired 10 MHz FDD

Ms. Marlene H. Dortch
May 18, 2005
Page Two

band plan, IPWireless can deliver data on the downlink at near T-1 (1.5 Mbps) data rates at the cell edge, and nearly 15 Mbps peak rate, with an average of 6 Mbps. Uplink speeds available to users range from 1.0 Mbps to over 9 Mbps.

Within two years, IPWireless expects to be able to deliver data on the downlink path at roughly twice today's rates, without any increase in spectrum required. For example, peak data rates for a paired 10 MHz solution are projected to double (from 14.6 to 29.0 Mbps) by 2007. At that time, the average downlink data rate in every cell is expected to double as well, reaching more than 12 Mbps. The downlink improvements will not diminish the performance of the uplink; uplink data rates will either remain constant (in the TDD solution) or be improved by up to 50 percent.

IPWireless has designed systems for all, or nearly all, major licensed frequency bands used internationally between 450 MHz and 3500 MHz. Its experience with both commercial and trial deployments has shown that the 700 MHz band is ideally suited for wide area public safety networks. The propagation characteristics of the 700 MHz band both enhance transmission quality (including better in-building penetration) and reduce infrastructure costs by reducing the number of base stations required in a given geographic area, while the wavelength permits practical antenna sizes on portable communication equipment.

IPWireless concurs in the views expressed by Northrop Grumman Information Technology ("NG") in comments submitted April 28, 2005 in this docket with respect to the inadequacy of the current 700 MHz allocation to meet even current public safety needs. As NG notes, in its comments at p. 10, even the "wideband" channels are only 150 kHz wide, barely sufficient for low-speed web browsing, much less for the relay of multiple real-time video streams of 1-2 Mbps each. As NG also notes (comments at p. 11) the recent allocation of 50 MHz of additional spectrum at 4.9 GHz does not meet the needs of wide area public safety networks due to the inherent limitations of radio propagation at higher frequencies. For example, a citywide network in the District of Columbia would require about 420 sites at 4.9 GHz, but only about 10 sites at 700 MHz.

To accommodate present and future needs of emergency response providers for wide area wireless coverage, the Commission should recommend to Congress an additional allocation of spectrum from the 700 MHz UHF band of at least 20 MHz of contiguous spectrum or, alternatively, two paired 10 MHz blocks suitable for FDD use.



Ms. Marlene H. Dortch
May 18, 2005
Page Three

Respectfully submitted,

DLA Piper Rudnick Gray Cary US LLP

/s/

Larry A. Blosser
larry.blosser@dlapiper.com